



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION IX**  
75 Hawthorne Street  
San Francisco, CA 94105

October 4, 2011

Brian G. Stewart, President  
Jervis B. Webb Company  
34375 W. 12 Mile Road  
Farmington Hills, MI 48331

Re: Request for Information Pursuant to CERCLA Section 104(e);  
Jervis B. Webb Co. Superfund Site

Dear Mr. Stewart:

The United States Environmental Protection Agency ("EPA") is spending public funds to investigate and respond to the release or threatened release of hazardous substances at the Jervis B. Webb Co. Superfund Site ("Site"), which is located at 9301 Rayo Avenue and 5030 Firestone Blvd. in South Gate, California. A Superfund site is a site contaminated with hazardous substances at levels that may present a threat to human health or the environment. EPA believes that you may have information that may assist EPA in its investigation. EPA needs the information and documents responsive to this request to proceed with this Superfund Site investigation. We appreciate your cooperation with this request.

The Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.C. §§ 9601-9675, as amended ("CERCLA" or "Superfund"), authorizes EPA to investigate and, if necessary, take action to protect human health and the environment at locations where there has been a release or threat of a release of a hazardous substance to the environment. Section 104(e) of CERCLA authorizes EPA to require persons with information related to hazardous substances releases to provide such information.

EPA has broad information gathering authority which allows EPA to require persons to furnish information or documents relating to:

- The identification, nature, and quantity of materials which have been or are generated, treated, stored, or disposed of at a vessel or Property or transported to a vessel or Property.
- The nature or extent of a release or threatened release of a hazardous substance, pollutant or contaminant at or from a vessel or Property.
- The ability of a person to pay for or perform a cleanup.

We encourage you to give this request for information your immediate attention. Instructions on how to respond to the questions are provided in Enclosure A. Your response to this letter should be made in writing, signed by you or your duly authorized representative, and returned to EPA within thirty (30) calendar days of your receipt of this letter. You may provide your response and attachments electronically in Adobe Portable Document Format (PDF) and deliver them to EPA by CDROM or through E-Mail, but you must mail a signed hardcopy of the letter portion with your responses to the EPA.

Your compliance with this request is mandatory. Pursuant to Section 104(e)(5) of CERCLA, 42 U.S.C. §9604(e), you must respond completely and truthfully to all questions contained in Enclosure B to this letter. Please be further advised that 18 U.S.C. §1001 provides for criminal penalties for the provision of false, fictitious or fraudulent statements or representations. Failure to respond fully and truthfully may result in enforcement action by EPA pursuant to Section 104(e)(5) of CERCLA, 42 U.S.C. Section 9604(e)(5). The CERCLA statutory provision authorizes EPA to seek the imposition of penalties of up to \$32,500 per day of noncompliance.

EPA understands that you may consider some of the requested information confidential. You may not withhold the information on that basis. If you wish EPA to treat the information confidentially, you must advise EPA of that fact by following the procedures outlined in Enclosure A, including providing support for your claim of confidentiality.

If you have information about other persons who may have information which could assist the Agency in its investigation, that information should be submitted within the timeframe noted above.

Please note that this request for information is not subject to review by the Office of Management and Budget (OMB) under the Paperwork Reduction Act because it is not an "information collection request" within the meaning of 44 U.S.C. §§3502(3), 3507, 3512, and 3518(c)(1). Furthermore, it is exempt from OMB review under the Paperwork Reduction Act because it is directed to fewer than ten persons. 44 U.S.C. §3502(4), (11); 5 C.F.R. §§1320.4 and 1320.6(a).

Your response to this request for information should be mailed within thirty (30) calendar days following receipt of this letter to:

Carl Brickner  
Case Developer, Mail Stop SFD-7-5  
United States Environmental Protection Agency, Region IX  
75 Hawthorne Street  
San Francisco, California 94105  
Email: [Brickner.Carl@epa.gov](mailto:Brickner.Carl@epa.gov)

If you have questions regarding this Information Request, please contact Carl Brickner at (415) 972-3814, or by email at [Brickner.Carl@epa.gov](mailto:Brickner.Carl@epa.gov). If you have questions about the history of the Site, the nature of the environmental conditions at the Site, or the status of cleanup activities,

please contact Eric Yunker at (415) 972-3159, or by email at [Yunker.Eric@epa.gov](mailto:Yunker.Eric@epa.gov). Please direct any legal questions to Jim Collins at (415) 972-3894 or by email at [Collins.Jim@epa.gov](mailto:Collins.Jim@epa.gov).

We appreciate your response to this information request, and look forward to cooperatively working with you on these matters.

Sincerely,

A handwritten signature in cursive script that reads "Kathi Moore". The signature is written in black ink and is positioned above the printed name and title.

Kathi Moore, Manager  
Case Development/Cost Recovery Section  
Site Cleanup Branch  
Superfund Division

Enclosures (2)

## ENCLOSURE A: INSTRUCTIONS AND DEFINITIONS

### Instructions:

1. Answer Each Question Completely. A separate response must be made to each of the questions set forth in this Information Request. For each question contained in this letter, if information responsive to this Information Request is not in your possession, custody, or control, please identify the person(s) from whom such information may be obtained.
2. Electronic Formats. Documents supporting your responses may be provided electronically in Adobe Portable Document Format (PDF), or preferably, searchable PDF (e.g., Optical Character Recognition (OCR)(PDF). If you choose to submit documents supporting your responses electronically, you must still provide a signed hardcopy of your response to each question.
3. Number Each Answer. When answering the questions in Enclosure B, please precede each answer with the corresponding number of the question and subpart to which it responds.
4. Number Each Document. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the question to which it corresponds.
5. Provide the Best Information Available. Provide responses to the best of Respondent's ability, even if the information sought was never put down in writing or if the written documents are no longer available. You should seek out responsive information from current and former employees/agents. Submission of cursory responses when other responsive information is available to the Respondent will be considered non-compliance with this Information Request.
6. Identify Sources of Answer. For each question, identify (see Definitions) all the persons and documents that you relied on in producing your answer.
7. Continuing Obligation to Provide/Correct Information. If additional information or documents responsive to this Request become known or available to you after you respond to this Request, EPA hereby requests pursuant to CERCLA Section 104(e) that you supplement your response to EPA.
8. Scope of Request. The scope of this request includes all information and documents independently developed or obtained by research on the part of your company, its attorneys, consultants or any of their agents, consultants or employees.
9. Confidential Information. The information requested herein must be provided even though you may contend that it includes confidential information or trade secrets. You may assert a confidentiality claim covering part or all of the information requested,

pursuant to Sections 104(e)(7)(E) and (F) of CERCLA, 42 U.S.C. §§9604(e)(7)(E) and (F), and Section 3007(b) of RCRA, 42 U.S.C. §6927(b), and 40 C.F.R. §2.203(b). If you make a claim of confidentiality for any of the information you submit to EPA, you must prove that claim. For each document or response you claim confidential, you must separately address the following points:

- a. clearly identify the portions of the information alleged to be entitled to confidential treatment;
- b. the period of time for which confidential treatment is desired (e.g., until a certain date, until the occurrence of a specific event, or permanently);
- c. measures taken by you to guard against the undesired disclosure of the information to others;
- d. the extent to which the information has been disclosed to others, and the precautions taken in connection therewith;
- e. pertinent confidentiality determinations, if any, by EPA or other federal agencies, and a copy of any such determinations or reference to them, if available; and
- f. whether you assert that disclosure of the information would likely result in substantial harmful effects on your business' competitive position, and if so, what those harmful effects would be, why they should be viewed as substantial, and an explanation of the causal relationship between disclosure and such harmful effects.

To make a confidentiality claim, please stamp, or type, “confidential” on all confidential responses and any related confidential documents. Confidential portions of otherwise nonconfidential documents should be clearly identified. You should indicate a date, if any, after which the information need no longer be treated as confidential. Please submit your response so that all nonconfidential information, including any redacted versions of documents are in one envelope and all materials for which you desire confidential treatment are in another envelope.

All confidentiality claims are subject to EPA verification. It is important that you satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so, and that it is not and has not been obtainable by legitimate means without your consent. Information covered by such claim will be disclosed by EPA only to the extent permitted by CERCLA Section 104(e). If no such claim accompanies the information when it is received by EPA, then it may be made available to the public by EPA without further notice to you.

10. Disclosure to EPA's Authorized Representatives. Information which you submit in response to this Information Request may be disclosed by EPA to authorized representatives of the United States, pursuant to 40 C.F.R. 2.310(h), even if you assert that all or part of it is confidential business information. The authorized representatives of EPA to which EPA may disclose information contained in your response are as follows:

- Department of Toxic Substances Control/California
- Regional Water Quality Control Board/California
- Toeroek Associates, Inc.  
EPA Contract Number BPA EP-BPA-11-W-001
- Science Applications International Corporation  
EPA Contract Number BPA EP-BPA-11-W-001
- CH2M Hill, Inc.  
EPA RAC Contract Number EP-S9-08-04
- GRB Environmental Services Inc.  
Contract Number EPR90603
- ITSI, Inc.  
EPA RAC Contract Number EP-S9-08-03
- Techlaw  
EPA ROC Contract Number EP-W07-066

Any subsequent additions or changes in EPA contractors who may have access to your response to this Information Request will be published in the Federal Register.

This information may be made available to these authorized representatives of EPA for any of the following reasons: to assist with document handling, inventory, and indexing; or to assist with document review and analysis for verification of completeness; or to provide expert technical review of the contents of the response. Pursuant to 40 C.F.R. §2.310(h), you may submit comments on EPA's disclosure of any confidential information contained in your response by EPA to its authorized representatives along with the response itself, within the thirty (30) calendar day period in which the response is due.

11. Objections to Questions. If you have objections to some or all of the questions contained in the Information Request letter, you are still required to respond to each of the questions.

## **Definitions:**

1. The term **“you”** or **“Respondent”** should be interpreted to include the addressee of this Information Request (Jervis B. Webb Company), the addressee's officers, managers, employees, contractors, trustees, successors, assigns and agents. The term "your" shall mean the possessive form of "you" so-defined.
2. The term **“person”** shall include any individual, firm, unincorporated association, partnership, corporation, trust, joint venture, or other entity.
3. The term **“document”** includes any written, drawn, typed, recorded, computer-generated, or photographically reproduced material of any kind in any medium in your possession, custody or control, otherwise available to you or known by you to exist; including originals, all drafts, final, and all non-identical copies. Examples of documents include but are not limited to letters; written notes; reports; photos; emails; facsimile transmissions; microfiche, correspondence; marketing documents, reports and data; documentation of internal inventories; purchases, purchase requisitions, and purchase orders; documentation of bills and accounting; invoices and other transaction records; purchase requisitions; shipment documentation and manifests; diagrams, charts, maps, and figures; retained correspondence; property title and deeds; leases and contracts; articles of incorporation; local, state or federal permits to operate, or to store, generate, transport, or dispose of hazardous substances, chemical raw materials and chemical intermediates, chemical products, mixtures; process chemicals; and chemical wastes; and any other documents responsive to the request.
4. The term **“waste”** or **“wastes”** shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, and pollutants or contaminants, whether solid, liquid, or sludge.
5. The term **“hazardous waste”** shall have the same definition as that contained in Section 1004(5) of RCRA.
6. The term **“hazardous substance”** shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
7. The term **“release”** has the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping or disposing into the environment, including the abandonment or discharging of barrels, containers and other closed receptacles containing any hazardous substance or pollutant or contaminant.
8. The term **“pollutant or contaminant”** shall have the same definition as that contained in Section 101(33) of CERCLA and include any mixtures of such pollutants and contaminants with any other substance including petroleum products.

9. The term “**materials**” shall mean all substances that have been generated, treated, stored, or disposed of or otherwise handled at or transported to the Site including, but not limited to, all hazardous substances, pollutants or contaminants.
10. The term “**Site**” shall mean the property located at 9301 Rayo Avenue and 5030 Firestone Blvd. in South Gate, California.
11. The term “**Company**” shall include any business entity formed of one or more individuals to conduct business in the state of California or any other state, and shall include and not be limited to corporations, partnerships, sole proprietorships, limited liability companies and any other business entity.
12. The term “**facility**” shall mean BOTH properties located at 9301 Rayo Avenue, South Gate, CA and 5030 Firestone Blvd., South Gate, CA.
13. **Undefined Terms.** All terms not defined herein shall have their ordinary meaning unless such terms are defined in CERCLA, 42 U.S.C. §§ 9601 et seq., in which case the statutory definitions shall apply.



## **ENCLOSURE B: QUESTIONS**

1. State the full legal name, address, telephone number, position(s) held by and tenure of the individual(s) answering any of these questions on behalf of Jervis B. Webb Company (“Webb”), and/or any of its predecessor or related entities, concerning certain real property located in South Gate, CA (the “Property”). For purposes of this Request for Information, “Property” shall be defined as including the following: a) 9301 Rayo Avenue, South Gate, CA; and b) 5030 Firestone Blvd, South Gate, CA. This Information Request is not limited to Webb, rather, it governs operations of any and all companies which have operated at the Property and which are, or were, in any way related to Webb (i.e., predecessors, parent companies, subsidiaries, etc.). Moreover, this Information Request governs operations of all of Webb and its predecessors or related entities, regardless of the name or names (i.e., fictitious business names, former names used by Webb, etc.) used by such entities during operations at the Property. Therefore, you must respond to each question below on behalf of Webb and any of Webb’s related entities, regardless of whether a question specifically references Webb and its related entities, or references Webb solely. Lastly, in the event that you have information concerning one parcel mentioned above, but not both parcels (i.e., 9301 Rayo Avenue but not 5030 Firestone Blvd.), then: a) you must provide all information concerning such parcel; and b) you must explicitly state which parcel you are addressing in each response where you address only one parcel.

### **Corporate**

2. Identify and explain the present corporate status (e.g., active, suspended, forfeited, merged out, inactive or dissolved) of Webb, and any and all of its predecessors, successors, subsidiaries, affiliated businesses or commercial enterprises, as well as the current and all former business forms used by such entity or entities (e.g., sole proprietorship, general partnership, limited partnership, joint venture or corporation). State the entire time period during which such entity or entities operated under each separate business form.
  - a. Provide the date each entity identified above was incorporated, formed or organized and identify the State in which the business was incorporated, formed or organized. Provide a copy of the Articles of Incorporation, Partnership Agreement, Articles of Organization or any other documentation demonstrating the particular business form, together with any and all amendments, for all business forms under which each entity identified above is or was ever operated.
  - b. Identify all fictitious business names, assumed names or names under which Webb or any of Webb’s predecessors, successors, subsidiaries, operating divisions, plants or branches conducted business and identify the time period during which each business operated. Provide a copy of the Fictitious Business Name Statement(s) filed with the county in which each entity is or was doing business.

- c. Identify and explain any and all mergers involving any and all of the entities identified above. Provide all documents governing any merger(s) you identify in response to this request.
3. Provide a list of all of Webb's officers by name, title and dates of office from the date of incorporation to the present.
4. Provide a list of all of Webb's directors from the date of incorporation to the present. Include the dates of service for each director.
5. Provide a list of all of Webb's shareholders (5 percent interest or greater in the company) from the date of incorporation to the present. Include the name, current or most recent address and phone number of each shareholder. As part of your response, provide the number and type of shares held by each shareholder, as well as the percentage of the company owned by each identified shareholder for each year, beginning with the date of incorporation.
6. Describe the corporate affiliation between Webb and Jervis B. Webb Company of California, a CA corporation ("Webb-California"). Provide copies of all documentation evidencing such affiliation. As part of your response, also provide the following information:
  - a. State whether Webb-California was a parent corporation, subsidiary, unincorporated division or operating unit, affiliate, or sister entity of Webb.
  - b. State whether Webb ever owned or had an interest in Webb-California.
  - c. If the answer to (b) is "yes", describe the nature and extent of any ownership interest that Webb had in Webb-California and when and how such ownership interest was acquired. In addition, describe the nature of the sale and/or transaction reflecting this ownership interest. Provide copies of all documents evidencing the purchase of assets of Webb-California by Webb, along with all attachments and schedules and any and all financing documents, including security agreements, promissory notes and financing statements.
  - d. State whether there was a merger between Webb and Webb-California. For all corporate mergers identified, please provide a copy of any merger document.
  - e. State whether any business records of Webb-California are still in existence. If the answer is "yes", state the location of these records.
7. Provide copies of organizational charts separately for Webb and Webb-California, and for each of their respective divisions or subsidiaries, from 1984 to 2004.
8. Provide copies of each annual or other periodic report separately for Webb and Webb-California, and for each of their divisions or subsidiaries, from 1984 to 2004.

9. Provide copies of all minutes, recordings, summaries or reports of meetings, whether formal or informal, draft or final, of the members of each board of directors of Webb and Webb-California and of each committee or subgroup of each board from 1984 to 2004.
10. Provide copies of all minutes, recordings, summaries or reports of meetings, whether formal or informal, draft or final, of the members of each committee, group or subgroup of management employees of Webb and Webb-California separately and for each of their respective divisions or subsidiaries from 1984 to 2004.
11. Describe in detail how and when Webb-California ceased business operations. As part of your response, specifically state whether Webb-California formally wound up its affairs (i.e., notified all creditors, distributed remaining assets, dissolved corporate form, etc.). Provide all documents evidencing how and when Webb-California ceased its business operations, including sale agreements for the final sale and/or transfer of company assets.
12. Describe in detail all Corporate Asset Transactions in which Webb participated, whether as a seller, purchaser, transferor or transferee of assets. Provide all documents evidencing any transactions you identify in response to this request, including copies of all asset purchase agreements and all supporting exhibits and attachments. For purposes of this Request for Information, "Corporate Asset Transaction" shall be defined as any transaction in which Webb purchased all or certain assets of another company or companies, or in which another company or companies purchased all or certain assets of Webb.
13. For each Corporate Asset Transaction you identify in response to Question 12 above, describe in detail the nature and amount of consideration paid for the assets (i.e., cash, assumption of liabilities, etc.). In identifying the consideration, identify the payor(s) and payee(s) of the consideration, state the amount paid in cash, the amount paid in promissory notes or other form of debenture payable to the entity and/or officers, directors and/or shareholders of the entity selling the assets, the value associated with the assumption of liabilities (if assumption of liabilities are involved, you must also identify the types of liabilities assumed), the value associated with the performance of services, the value associated with shares of stock exchanged as part of the sale, and the type and value associated with any other form of consideration not identified above.
14. For each Corporate Asset Transaction you identify in response to Question 12 above, specifically identify the Assets sold or purchased, including, without limitation, customer lists, real estate, buildings, equipment and inventory. Provide all documents evidencing the sale or purchase of such assets. For purposes of this Request for Information, an "Asset" may include, but not in any way be limited to, the following: a) inventory; b) equipment; c) intangibles and intellectual property; d) employee records; e) customer lists; f) computer software; g) computer hardware; h) contract rights; i) accounts receivable; j) licenses or permits; k) pre-paid expenses; l) corporate goodwill; m) rights to proceeds under insurance policies; and n) real property.
15. For each Corporate Asset Transaction you identify in response to Question 12 above, identify all creditors that were advised of the sale of assets prior to the sale.

16. For each Corporate Asset Transaction you identify in response to Question 12 above, describe in detail the nature of the seller's business and the nature of the buyer's business.
17. For each Corporate Asset Transaction you identify in response to Question 12 above, if any entity participating in the transaction ceased operations, liquidated, dissolved or otherwise changed or terminated its operations after the transaction, indicate the specific change to its status and include the dates of any such actions.
18. Identify the parent company or companies (i.e., indirect and direct parent companies) and all subsidiaries of Webb. For each such company identified in response to this Question, state the ownership interest, expressed in percentages, held by each entity (i.e., Webb held 90% of shares of its subsidiary, Company X).
19. Identify and specifically describe all Joint Ventures in which Webb participated. Provide all documents evidencing Webb's participation in such ventures, including all Joint Venture agreements and supporting exhibits and attachments. For purposes of this Request for Information, a "Joint Venture" shall be defined as any association, whether by express or implied agreement, that Webb had with another entity or entities for the purpose of carrying on a business enterprise for profit.

#### **Real Property**

20. Documentation obtained by EPA indicates that Webb and/or one or more of its predecessors or related entities previously owned the Property. Provide a copy of the deed and purchase agreement or other recorded instrument of conveyance evidencing your ownership of the Property. As part of your response, identify the dates you owned the Property.
21. Identify the entity or individual who sold or otherwise transferred the Property to you and/or one or more of your predecessors or related entities. Provide all documents evidencing such sale or transfer (i.e., deed, purchase agreement, or other instrument of conveyance).
22. Identify the entity or individual to whom you and/or one or more of your predecessors or related entities sold or otherwise transferred the Property. Provide all documents evidencing such sale or transfer (i.e., deed, purchase agreement or other instrument of conveyance).
23. During the ownership of the Property by you and/or one or more of your predecessors or related entities, did you own the Property jointly with any other individuals or entities? If so, provide the name, address and phone number of each such joint owner and provide the periods of such joint ownership. In addition, provide all documents evidencing such joint ownership of the Property.
24. During the ownership of the Property by you and/or one or more of your predecessors or related entities, did you rent or lease the Property to another individual or entity? If so,

identify all such individuals and/or entities and provide copies of all leases, rental agreements or any other documents that evidence such rental or leasehold relationship.

25. Identify all prior owners of the Property from 1940 to the date you and/or one or more of your predecessors or related entities acquired the Property, and provide the dates each owner owned the Property. Provide copies of all deeds, ownership records and any other documents evidencing each such owner's interest in the Property.

## **Operations**

26. Identify the dates you operated at the Property. If you were not the owner of the Property at any time during your period of operations there, provide a copy of the lease(s), rental agreement(s) or any other document(s) that establish(es) your relationship to the Property.
27. Identify and explain all of your business operations at the Property, including such information as the number of employees, the size of the Property, dates of operation, product(s) manufactured and a description of the daily activities. Include a historical perspective of all changes in operations over time. In addition, provide a scaled map of the Property, which includes the locations of significant buildings and features. Indicate the locations of any maintenance shops, hazardous material or waste storage area(s), machine shops, degreasers, liquid waste tanks, clarifiers, chemical storage tanks, fuel tanks, including, but not limited to "Tank 1", "Tank 2", and the 250-gallon sump. Provide a physical description of the Property and identify the following:
- a. Surface structures (e.g., buildings, tanks, containment and/or storage areas, etc.);
  - b. Subsurface structures (e.g., underground tanks, sumps, pits, clarifiers, etc.);
  - c. Groundwater and dry wells, including drilling logs, date(s) of construction or completion, details of construction, uses of the well(s), date(s) the well(s) was/were abandoned, depth to groundwater, depth of well(s) and depth to and of screened interval(s);
  - d. Past and present stormwater drainage system and sanitary sewer system, including septic tank(s) and subsurface disposal field(s);
  - e. Any and all additions, demolitions or changes of any kind to physical structures on, under or about the Property or to the property itself (e.g., excavation work), and state the date(s) on which such changes occurred; and
  - f. Indicate the location of all waste storage or waste accumulation areas, waste disposal areas, dumps, leach fields, burn pits and any other disposal locations.
28. If you are not currently operating at the Property, identify the current operators at the Property and provide the dates such current operators began doing business at such address. To the best of your knowledge, describe the types of current operations at the

Property. Provide copies of all environmental documents and Property information in your possession regarding current operations at the Property.

29. Identify any prior operators at the Property and provide the dates each business operated. To the best of your knowledge, describe the types of operations that occurred at the Property. Provide copies of all environmental documents and Property information in your possession regarding prior operators.
30. Have you ever or do you currently use, manufacture, produce, or generate any hazardous substances/materials/waste in the operations at the Property? If your answer is anything other than an unqualified “no” for the entire period since 1940:
  - a. Identify the trade or brand name, chemical composition, and quantity used for each chemical or hazardous substance, and the relevant Material Safety Data Sheet for each product, and its period of use;
  - b. Describe the process in which the hazardous substance is or was used, manufactured, generated or produced (including any current or discontinued processes);
  - c. The location(s) where each chemical or hazardous substance is or was used, stored and disposed of. In addition, identify the kinds of wastes (e.g., scrap metal, construction debris, motor oil, solvents, waste water), quantities and methods of disposal for each chemical or hazardous substance;
  - d. Provide copies of all hazardous materials business plans and chemical inventory forms (originals and updates) submitted to city, county and/or state agencies; and
  - e. Provide copies of all manifests governing hazardous substances generated by your operations at the Property.
31. Provide copies of any applications for permits or permits received for the facility under any local, state, or federal environmental laws and regulations, including any waste discharge permits, such as national pollutant discharge elimination system permits.
32. If the Company discharged any of its waste stream to the sewer at the facility, provide copies of all permits and all analyses performed on discharged water, and identify all locations where waste streams were discharged.
33. For each waste stream generated at the facility, describe the procedures for (a) collection, (b) storage, (c) treatment, (d) transport, and (e) disposal of the waste stream.
34. Please provide a detailed description of all pre-treatment procedures performed by the Company on its waste streams at the facility prior to transport to a disposal site.
35. Please describe the method used by the Company to remove waste streams from sumps and/or clarifiers at the facility.

36. Please identify all wastes that were stored at the facility prior to shipment for disposal. Describe the storage procedures for each waste that was stored prior to disposal.
37. Please identify all leaks, spills, or other known or suspected releases into the environment of any hazardous substances or pollutants or contaminants that have occurred at or from the facility. In addition, identify and provide supporting documentation of:
  - a. The date each known or suspected release occurred or was believed to have occurred;
  - b. The cause of each known or suspected release;
  - c. The known or suspected amount of each hazardous substance, waste, or pollutant or contaminant released during each release;
  - d. Where each release occurred and what areas were impacted by the release; and
  - e. Any and all activities undertaken in response to each release, including the notification of any local, state, or federal government agencies about the release.
38. Provide copies of any correspondence between the Company and local, state, or federal authorities concerning the use, handling, or disposal of hazardous substances at the facility, including but not limited to any correspondence concerning any of the releases identified in response to the previous question.
39. Provide copies of any and all documents evidencing your environmental practices at the Property, including, but not limited to, documents setting forth your waste management practices and procedures.
40. Provide copies of all environmental data or technical or analytical environmental information regarding soil, water, and air conditions at the Property, including, but not limited to, any known or suspected releases of hazardous substances to any media (soil, water or air) and any data and documents related to soil, water (ground and surface), geology, hydrogeology, soil sampling, soil gas sampling or air quality on or at the Property. As part of your response, include any and all letters of enforcement from any regulatory agency concerning operations or events at the Property and inspection notes, citizen complaints, letters of enforcement from any regulatory agency and formal notices of violation.
41. Provide all documentation, drawings, diagrams, plans, blueprints, photographs, and flow charts that discuss or depict channels, pits, underground storage tanks, aboveground storage tanks, ponds, drywells, sumps, clarifiers, including, but not limited to "Tank 1", "Tank 2", the 250-gallon sump, and any other aboveground or underground structures used for storage or disposal since the beginning of Webb's operations at the facility, or 1940, whichever is earlier.

42. Describe how Webb used the channels, pits, underground storage tanks, aboveground storage tanks, ponds, drywells, sumps, clarifiers, including, but not limited to “Tank 1”, “Tank 2”, the 250-gallon sump, and any other aboveground or underground structures used for storage or disposal identified in Question 41, above.
43. Were substances containing volatile organic compounds ever pumped, drained, discharged, injected and/or released to the channels, pits, underground storage tanks, aboveground storage tanks, ponds, drywells, sumps, clarifiers, including, but not limited to “Tank 1”, “Tank 2”, the 250-gallon sump, and any other aboveground or underground structures used for storage or disposal identified in Question 41, above?
44. Identify and provide copies of any documentation of any hazardous waste-related tax paid by Webb related to any facility from which waste was sent to an off-site disposal facility, and identify the dates upon which you paid such taxes, including but not limited to a description of whether such tax(es) were local, state or federal and the specific regulations under which you were required to pay the tax(es).
45. List and provide copies of all Federal, State, County, City and all other local permits, licenses, and/or registrations and their respective permit numbers issued concerning the facility and the storage, use, and discharge of substances containing volatile organic compounds, including but not limited to permits and correspondence related to Publicly Owned Treatment Works (“POTW”), Los Angeles County permits and licenses, and California Air Quality Management District permits and licenses. Your response must include all compliance testing results for all waste streams exiting the facility.
46. State whether Webb has or had a permit or permits issued under the Resource Conservation and Recovery Act (“RCRA”) for the facility. If the answer is “yes,” identify all such permits, including but not limited to the dates of issuance and a general description of the process permitted. Provide copies of all such permits.
47. Documentation obtained by EPA indicates that representatives of Webb, including Michael Farley and Eli Stanesa, were involved in remediation and cleanup activities at the Property. Describe in detail Webb's role in the remediation and cleanup activities at the Property, including Webb's relationship with Webb-California in the management and payment of the costs of these activities.
48. Provide copies of all invoices, statements, cancelled checks, etc. for expenses incurred in connection with the remediation and cleanup activities at the Property.
49. Provide copies of all information and documentation related to Webb acting on behalf of Webb-California in any financial transaction.
50. Provide copies of all information and documentation related to approval of any remediation or cleanup activities conducted during your ownership or operations at the Property.
51. At the time Webb first took possession of the Property, state whether you were aware of any contamination of such property, and describe your efforts at the time to determine if



such property had been contaminated or otherwise environmentally impaired. Provide all documentation evidencing your efforts to determine whether such property was contaminated or environmentally impaired at the time you first took possession of it (e.g. Phase I or other due diligence report). Describe the environmental condition of the Property at the time you first took possession of it. Specifically, describe any contamination and/or hazardous substances, or any evidence suggesting the possible presence of contamination and/or hazardous substances that may have been present at the Property at the time you first took possession of it.

52. Provide a list of employees who had knowledge of the use and disposal of hazardous substances at the Property during the entire time period that Webb, or any of its predecessors, successors, subsidiaries, affiliates, contractors, trustees, assigns or agents, was associated with this Property. For each employee listed, provide the following information:
- a. The employee's full name;
  - b. The employee's current or last known address(es) and telephone number(s), including the last known date on which you believe each address and telephone number was current;
  - c. The employee's Social Security Number;
  - d. Identify the entire time period that the employee worked at the Property; and
  - e. The position(s) the employee held with each business entity during his or her entire period of employment at the Property and the year or years that the employee held each listed position.



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October 6, 2011

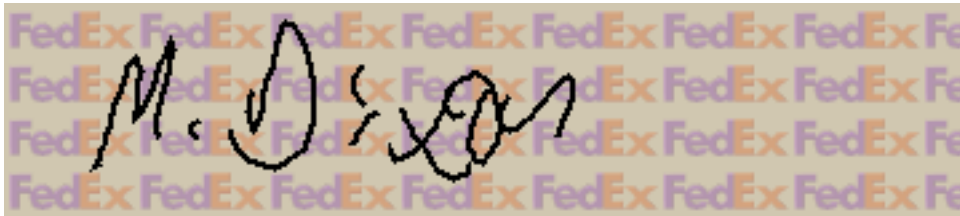
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